



Jared Golden
Congress of the United States
2nd District of Maine

July 25, 2019

Acting Secretary Patrick Pizzella
United States Department of Labor
200 Constitution Avenue Northwest
Washington, D.C. 20210

Dear Secretary Pizzella,

I write to express my grave concerns about the Department's proposed rule (84 FR 29970) to change Industry-Recognized Apprenticeship Programs (IRAPs) by letting individual businesses function as Standards Recognition Entities. Along with directly impacting labor unions representing thousands of workers in my district, this rule could destroy the registered apprenticeship system that has long been established by those unions as a pathway to successful careers.

Our country's long standing registered apprenticeship system has a strong record of success. Registered apprenticeship sponsors--particularly labor unions and their industry partners--invest billions of dollars annually in these apprenticeships because they pay significant returns to both businesses and workers. Businesses gain a skilled, reliable labor force that efficiently and safely performs high-quality work. Workers gain the long-term security of a nationally-recognized credential and earn approximately \$300,000 more during their career than non-apprenticeship workers. This is real money that is reinvested in communities across the country. These benefits of apprenticeships cannot be divorced from all the work that goes into creating and maintaining them.

Registered apprenticeships are valuable because they meet rigorous, verified standards. Under the National Apprenticeship Act of 1937, all registered apprenticeships in the U.S. have been required to meet standards established and judged by either the U.S. Department of Labor (DOL) or state agencies recognized by DOL. These standards include minimum numbers of hours in classroom instruction and worksite training, schedules of progressively increasing wages during the apprenticeship, and safe facilities and equipment. Labor unions and their partners invest in individuals' long term success by spending decades pouring their time, knowledge, and energy into registered apprenticeships. DOL should not take that work--and that proven track record of safety and success--for granted.

The proposed IRAPs rule could lead to quick, cheap, dangerous, and low-quality apprenticeships. Unlike current registered apprenticeships, where a neutral and qualified third party establishes and ensures compliance with apprenticeship standards, the proposed IRAPs rule would let industry groups and even individual businesses become a Standards Recognition Entity. This erases any meaningful difference between the entity writing and enforcing apprenticeship rules and the businesses that are supposed to follow them. At the very least, this could result in weakened standards, leaving IRAP graduates without robust skills and eroding the credential earned by every worker in registered apprenticeships. More tragically, shortcuts in training can lead to less safe worksites, putting people's lives at risk. We must not take that chance.

My concern is not that all or even most private businesses want to run subpar apprenticeship programs. Again, responsible employers working with unions have made significant investments in registered apprenticeships for decades. Rather, I am concerned that some businesses seeking apprenticeship programs outside current standards are looking to cut corners and boost their own profits.

I agree that we need to grow the number of apprenticeships in our country and expand them into emerging fields. Letting businesses run cheaper, weaker apprenticeships, however, would be penny wise and pound foolish. I respectfully urge you to reject the IRAPs rule as currently proposed.

Respectfully,

A handwritten signature in blue ink, reading "Jared F. Golden". The signature is fluid and cursive, with the first name "Jared" being more prominent than the last name "Golden".

Jared Golden
Member of Congress